GARCIA-ARREGUI & FULLANA LAW OFFICES

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Mr. Wilhelm Sack The Horned Dorset Primavera Inc Rincon, PR 00677

October 21, 2016

Invoice 11047

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Professional Services

	Hrs/Rate	Amount
ADEQUATE ASSURANCE ISSUES		
4/19/2016 Several emails with client regarding payments to AEE. Balance due. Email receipt from Lic. Colon, AEE payments.	1.00 250.00/hr	250.00
4/20/2016 Several emails to and from client as to balance pending from AEE, and possibility of Bond.	0.60 250.00/hr	150.00
4/21/2016 Draft memo to AEE.	0.60 250.00/hr	150.00
4/29/2016 Several exchanges of email with debtor, Lic. Cintron, RE: debt to AEE.	0.60 250.00/hr	150.00
5/2/2016 Email exchange regarding the posting of as bond and payment of due amounts.	0.60 250.00/hr	150.00
5/3/2016 Review memo summary operation for year 2016. Exchange email regarding AEE payments.	0.80 250.00/hr	200.00
Receipt, review and lodging of documents as to the \$10,000.00 bond.	0.60 250.00/hr	150.00
Email from Mr. Sack / RE: AEE Bond.	0.10 125.00/hr	12.50
5/4/2016 Receiving email or memo from Mr. Aquino of HDP / RE: Bond contract for PREPA	0.60 125.00/hr	75.00

		Hrs/Rate	Amount
5/6/2016	Memo to Lic. Colon PREPA, submitting Bond for \$10,000.00.	0.60 250.00/hr	150.00
5/9/2016	Email to debtor confirming communication with representative of AEE as to payment on May 25.	0.60 250.00/hr	150.00
	phone conference with Lic. Cintron/AEE / RE: memo of conversation with regional manager	0.60 250.00/hr	150.00
5/20/2016	Receiving email or memo from regional area manager / RE: PREPA	0.10 125.00/hr	12.50
5/24/2016	Email to Atty. Fullana/RE: PREPA issues.	0.20 125.00/hr	25.00
	phone call to Mr. Sack on follow up to PREPA issues.	0.30 125.00/hr	37.50
	Phone call with Mr. Sack/RE;PREPA.	0.30 125.00/hr	37.50
5/25/2016	Phone call with Mr. Sack/RE: possible service disconnection PREPA.	0.40 125.00/hr	50.00
6/1/2016	Receiving email or memo from client draft of email to Lic Cintron AEE / RE: description of invoices pending for adequate assurance and services.	0.60 250.00/hr	150.00
6/3/2016	Receipt, review and lodging of email regarding PREPA	0.60 250.00/hr	150.00
6/9/2016	phone conference with PJ Rivera, debtor accountant, RE: statement of account payment to PREPA.	0.30 250.00/hr	75.00
	Meeting at PREPA	2.00 250.00/hr	500.00
	Review invoices and payments analysis of payment and application.	1.00 250.00/hr	250.00
6/10/2016	Draft email to Mr. Sack / RE: meeting with AEE representative.	0.60 250.00/hr	150.00
	phone conference with Zenaida / RE: AEE reunion.	0.30 250.00/hr	75.00
6/20/2016	Exchange email regarding Bond.	0.60 250.00/hr	150.00
6/24/2016	Email reply to AEE copy to PJ Rivera.	0.60 250.00/hr	150.00

125.00/hr

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Hrs/Rate **Amount** 7/7/2016 email payment to AEE Bond. 0.60 150.00 250.00/hr 7/8/2016 Exchange email issue regarding AAA. 0.60 150.00 250.00/hr phone call to Mr. Sack verify amount overdue for payment AAA. 0.60 150.00 250.00/hr phone conference with Lic. Rodriguez AEE - issues as to 0.60 150.00 cutting of service - proposed plan. 250.00/hr 8/5/2016 drafting and sending email or memo to Lic. Cintron. Balance of 0.60 150.00 account. 250.00/hr phone calls relating to outstanding debt owed to AEE. 0.60 150.00 250.00/hr 8/16/2016 phone call to Hiram Boscio, RE: regarding bond. 0.60 150.00 250.00/hr 9/6/2016 Receiving email or memo from Zenaida Feliciano RE: adequate 0.20 25.00 assurance PREPA 125.00/hr SUBTOTAL: 19.60 4,625.00] Adversary matters, filing drafting 5/16/2016 Review initial draft of complaint against T&C Inmobillaria. 0.80 200.00 250.00/hr 5/25/2016 Meeting with Lic. Bennazar, Capdevila, RE: pending matters 2.00 500.00 and draft of complaint argument, collection of monies against 250.00/hr residents 6/6/2016 Email from Bennazar / RE: translated documents for complaint. 0.60 150.00 16-00156 250.00/hr 6/10/2016 Amended complaint against Inmobiliaria T & C to include 0.30 37.50 pledge of jurisdictional grounds and venue 125.00/hr 6/16/2016 Receipt, review and lodging of claim for damages Villa 10 0.60 150.00 16-00141 250.00/hr preparing of initial legal memorandum or motion to be filed with 0.60 150.00 the court. Request online for a certification from the Registry of 250.00/hr Property 16-00156 6/22/2016 Worked on draft of adversary for declaratory judgment. 1.30 162.50

	Hrs/Rate	Amount
6/23/2016 Worked on draft of adversary for declaratory judgment.	3.90 125.00/hr	487.50
6/24/2016 Worked on draft of adversary against claim 10.	0.60 125.00/hr	75.00
6/29/2016 Worked on adversary proceeding and amended complaint against Domenech	1.80 125.00/hr	225.00
6/30/2016 Discussion allegations in complaint. 16-00156	0.60 250.00/hr	150.00
Worked on complaint for declaratory judgment.	3.80 125.00/hr	475.00
7/1/2016 Amended complaint against Domenech.	2.00 125.00/hr	250.00
7/6/2016 Review draft final complaint objection to claim. 16-00141	1.00 250.00/hr	250.00
7/7/2016 Review and comments injunction. 16-00141	1.00 250.00/hr	250.00
Drafted declaration affidavit for TRO.	0.80 125.00/hr	100.00
Made final changes to complaint to incorporate Atty. Fullana's comment.	2.30 125.00/hr	287.50
Drafted preliminary injunction request.	1.40 125.00/hr	175.00
phone call with Lcdo. Bennazar, Re: Complaint Inmobiliaria T&C	0.40 125.00/hr	50.00
phone call with Mr. Sack, RE: Temporary preliminary injunction	on 0.60 125.00/hr	75.00
7/8/2016 Review final draft urgent motion preliminary injunction filing. 16-00141	0.80 250.00/hr	200.00
Review and analyzed court order, RE: TRO hearing.	0.30 125.00/hr	37.50
Prepared and sent of service of summons.	1.00 125.00/hr	125.00
7/11/2016 Filing of summons executed.	0.30 125.00/hr	37.50

		Hrs/Rate	Amount
7/12/2016 email photo pool.	Adv. 16-00141	0.60 250.00/hr	150.00
7/13/2016 Receipt, review a preliminary injunc	and lodging of pool, prepare for hearing ction.	0.30 250.00/hr	75.00
phone call with M	Ir. Sack, RE: TRO pictures of the pool condition	0.60 125.00/hr	75.00
7/14/2016 Prepared and dra	afted direct examination of Mr. Sack.	0.90 125.00/hr	112.50
Receiving email o	or memo from Mr. Sack, RE: pictures for TRO	0.30 125.00/hr	37.50
	eliminary hearing conversation with client and ed Yassim. 16-00141	2.00 250.00/hr	500.00
Review and analy	zed minutes of hearing on injunction.	0.40 125.00/hr	50.00
Court Appearance	e for hearing on TRO	2.00 125.00/hr	250.00
7/19/2016 Drafted motion fo	or embargo of real property.	1.80 125.00/hr	225.00
Drafted motion fo	or embargo of real property.	1.80 125.00/hr	225.00
7/20/2016 Amended motion without bond.	for embargo to discuss standard for such	1.70 125.00/hr	212.50
Worked on Motion presumptions.	n for embargo to discuss evidence and legal	3.30 125.00/hr	412.50
7/21/2016 Amended motion Fullana's comme	for embargo to include Bennazar and nt.	1.20 125.00/hr	150.00
Drafted proposed	I order and writ for embargo	0.90 125.00/hr	112.50
Drafted affidavit f	or client for embargo request.	0.40 125.00/hr	50.00
Receiving email o	or memo from Mr. Sack, RE: adversary.	0.20 125.00/hr	25.00
Receiving email of statement for eml	or memo from Mr. Sack, RE: un sworn bargo	0.20 125.00/hr	25.00

250.00/hr

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T& C Inmobiliaria 16-00156

		Hrs/Rate	Amount
8/2/2016	Filing of Summons Executed. Adv. Inmobiliaria T&C	0.20 125.00/hr	25.00
8/15/2016	phone conference with Mr. Sack, amount needed for embargo, Reply including amount. 16-00156	0.60 250.00/hr	150.00
8/17/2016	Conference with HDP, RE: nunc pro tunc embargo, information as to security. 16-00156	0.60 250.00/hr	150.00
8/26/2016	Review final draft motion for embargo .16-00156	0.60 250.00/hr	150.00
	Filing of Motion to amend embargo. Adv. 16- 00156	0.10 125.00/hr	12.50
	Drafted proposed amended order and writ. Adv. 16-00156	0.40 125.00/hr	50.00
	Drafted motion to amend embargo order. 16-00156	2.00 125.00/hr	250.00
	Meeting with Lcda Fullana to discuss intervention and strategy for opposition. Adv. 16-00156	0.80 125.00/hr	100.00
	Review and analyzed PRCI's motion for intervention and complaint 16-00156	1.30 125.00/hr	162.50
	Receipt, review and lodging of leave to file counter claims non core, review of complaint filed. 16-00156	1.00 250.00/hr	250.00
9/1/2016	Review and analyzed preliminary draft of expert report. Adv. 16-00141	0.50 125.00/hr	62.50
	Drafted Motion for Default Judgment. Adv. 16-00156	1.40 125.00/hr	175.00
	Filing of motion for entry of Default .Adv. 16-00156	0.20 125.00/hr	25.00
	Drafted Motion to vacate order allowing PRCI's Intervention. Adv. 16-00156	1.00 125.00/hr	125.00
	Receipt, review and lodging of order granting intervention and other.	0.60 250.00/hr	150.00
	Review draft default.`ad. 16-00156	0.60 250.00/hr	150.00
	Receipt, review and lodging of appearance, Alexis Fuentes on behalf of T&C	0.30 250.00/hr	75.00

		Hrs/Rate	Amount
9/2/2016	Worked on opposition to PRCI's Intervention. Adv. 16-00156	3.40 125.00/hr	425.00
	Worked on draft of opposition to PRCI's intervention. Drafted argument relating to lack of standing and mortgage law protection. Adv. 16-00156	2.40 125.00/hr	300.00
	Discussing as to motion filed by PRCI / motion to vacate. Adv. 16-00156	0.80 250.00/hr	200.00
	Discussion information pertaining discovery, initial disclosures. 16-00141	0.60 250.00/hr	150.00
9/6/2016	Worked on draft of opposition to intervention complaint. Adv. 16-00156	3.20 125.00/hr	400.00
	Legal Research as to possible grounds of dismissal of the HDP's complaint for lack of subject matter jurisdiction as a non-core matter; and research as to a way to counter there. Adv. 16-00156	2.00 125.00/hr	250.00
9/7/2016	Worked on amendments to motion to vacate and opposition to intervention. Adv. 16-00156	1.90 125.00/hr	237.50
	Made final changes to motion to vacate as instructed by Atty. Fullana and added hyperlinks. Adv. 16-00156	0.40 125.00/hr	50.00
	Review and analyzed certified translation of registrars certification. Adv. 16-00156	0.30 125.00/hr	37.50
	Review final draft motion to vacate .adv. 16-00156	0.80 250.00/hr	200.00
	Review final draft motion.16-00156	0.60 250.00/hr	150.00
	review of Initial draft of request for entry of default. 16-00156	0.60 250.00/hr	150.00
9/8/2016	Review and analyzed motion filed by Defendants adv. 16-00156	0.30 125.00/hr	37.50
9/9/2016	phone call with Lcdo. Añeses, RE: request of copy of deed. 16-00141	0.10 125.00/hr	12.50
9/12/2016	phone call with Lcdo. Añeses, RE: exhibits of Deed of Restrictive covenants. Adv. 16-00141	0.20 125.00/hr	25.00
	Meeting with Atty. Fullana to discuss status of case and conversation with. Adv. 16-00141	0.30 125.00/hr	37.50

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	Hrs/Rate	Amount
9/13/2016 Review and analyzed motion to dismiss filed by Defendants .adv. 16- 00141	0.70 125.00/hr	87.50
Review and initial review MTD/Domenech. 16-00141	0.80 250.00/hr	200.00
9/16/2016 Review and analyzed court order, RE: motion to dismiss Adv. 16-00141	0.20 125.00/hr	25.00
9/20/2016 Review and analyzed motion filed by PRCI and discussion with Lcda. Fullana as to course of action. Adv. 16- 00156	0.60 125.00/hr	75.00
9/21/2016 Receiving email or memo from client / RE: Pool Room 10 Adv. 16-00141	0.20 125.00/hr	25.00
9/23/2016 Review and analyzed court order, DKT 29 adv. 16-00156	0.10 125.00/hr	12.50
9/26/2016 Review and analyzed opposition to motion to vacate filed by PRCI, DKT 31 Adv. 16-00156	1.30 125.00/hr	162.50
9/27/2016 Meeting with Atty. Fullana to discuss PRCI position as to rank of lien and conversation with Property Registrar. Adv. 16-00156	0.40 125.00/hr	50.00
9/28/2016 Review and analyzed motion submitting documents filed by PRCI. 16-00156	0.60 125.00/hr	75.00
Meeting with Atty. Fullana to discuss strategy to contest mortgage over property. 16=00156	0.80 125.00/hr	100.00
9/30/2016 Receipt, review and lodging of answer to complaint. 16-00156	0.60 250.00/hr	150.00
preparing of initial legal memorandum or motion to be filed with the court. ADV. 16-00141	1.40 125.00/hr	175.00
Review file. 16-00141	0.90 125.00/hr	112.50
Meeting with Atty. Fullana to discuss answer to complaint and strategy to tackle CRIM issue. 16-00156	0.60 125.00/hr	75.00
Filing of Motion for Ext of time. 16-00141	0.10 125.00/hr	12.50
SUBTOTAL: [96.80	14,925.00]
APPLICATION FROFESIONALS		
4/12/2016 Drafting second application for compensation.	1.80 250.00/hr	450.00

		_	Hrs/Rate	Amount
4/12/2016	Drafting notice to creditors, accountant and debtor second application.		0.60 250.00/hr	150.00
4/25/2016	Drafting and filing application for compensation special counsel and notice.		1.00 250.00/hr	250.00
6/15/2016	Receipt, review and lodging of professional services AJB, Drafting second application for fees.		1.00 250.00/hr	250.00
6/16/2016	Draft second application for compensation AJB. Copy by email.		1.00 250.00/hr	250.00
	SUBTOTAL:	[5.40	1,350.00]
	Drafting Disclosure Statement and Plan			
5/3/2016	Receipt, review and lodging of objection to disclosure statement.		0.60 250.00/hr	150.00
	Review and analyzed objection filed by US Trustee to D. S.		1.10 125.00/hr	137.50
5/4/2016	Receipt, review and lodging of objection filed by the US Trustee.		0.80 250.00/hr	200.00
5/5/2016	phone conference with Pedro Rivera as to objection to disclosure statement filed by US Trustee.		0.60 250.00/hr	150.00
5/13/2016	phone call with CPA Rivera to discuss UST objection to D. S.		1.30 125.00/hr	162.50
5/16/2016	Prepare for hearing disclosure statement. Review objection to disclosure statement by US Trustee.		1.80 250.00/hr	450.00
	Email from CPA: objection by US Trustee to financial information and discussion of same.		1.00 250.00/hr	250.00
	Receipt, review and lodging of accountant reply to Trustee's objection.		0.60 250.00/hr	150.00
5/17/2016	Court Appearance for Hearing/Disclosure Statement.		1.80 250.00/hr	450.00
	Meeting with CPA Rivera reply to objection to US Trustee		0.60 250.00/hr	150.00
	Telephone conference with Atty. Fullana to discuss outcome of hearing on D. S. and strategy.		0.40 125.00/hr	50.00
5/18/2016	Review and analyzed minutes of hearing on D.S		0.30 125.00/hr	37.50

	Hrs/Rate	Amount
SUBTOTAL: [10.90	2,337.50]
EXECUTORY CONTRACT MATTERS		
5/25/2016 Receipt, review and lodging of motion to assume executory contract	0.60 250.00/hr	150.00
6/20/2016 Receipt, review and lodging of contracts management of Villas.	1.00 250.00/hr	250.00
6/21/2016 Phone call with Lic. Bennazar; Re addresses to notify the assumption of the executory contract	0.60 250.00/hr	150.00
Review and analyzed reports sent by Zenaida Feliciano, RE: Room 29 contract.	1.70 125.00/hr	212.50
6/22/2016 Email exchange information as address of all owners of residents.	0.30 250.00/hr	75.00
6/24/2016 Receiving email or memo from client (Mr. Sack), RE: issues with pool of Room 10.	0.30 125.00/hr	37.50
6/27/2016 final draft of motion,memorandum and filing with the court by ECM; Motion to assume executory contracts and usufruct	2.00 250.00/hr	500.00
7/5/2016 Email to Mr. Sack, RE: room 29 contract.	0.40 125.00/hr	50.00
7/7/2016 Email exchange with Mr. Sack and Lcdo. Bennazar, RE: executory contract Room 29	0.40 125.00/hr	50.00
7/12/2016 Receiving email or memo from Mr. Sack, RE: executory contract Room 29	0.40 125.00/hr	50.00
7/15/2016 Drafting motion requesting entry of order granting assumption of executory contracts.	0.80 250.00/hr	200.00
Review and analyzed objection to assumption of executory contract and discussion with Atty Fullana	0.80 125.00/hr	100.00
7/18/2016 Motion to quash PRCI objection	1.00 250.00/hr	250.00
7/21/2016 email document/ memo to Mr. Sack, RE: contract with Michael Rabinowitz	0.20 125.00/hr	25.00
9/6/2016 Review and analyzed Grovas motion in opposition.	1.00 125.00/hr	125.00
Drafted motion for leave to file reply motion to Grovas' motion.	0.80 125.00/hr	100.00

		_	Hrs/Rate	Amount
9/6/2016	Receiving email or memo from Lcdo. Jaime Velasco, RE: meeting with Groves Rental.		0.30 125.00/hr	37.50
	Email to Mr. Sacks, RE: Grovas 's motion to reject contract.		0.30 125.00/hr	37.50
9/7/2016	Drafted Motion for entry of order granting unopposed motion to quash.		1.60 125.00/hr	200.00
9/9/2016	Meeting with Lcdo. Velasco and Lcda. Fullana		0.80 125.00/hr	100.00
	Meeting with counsel for Grovas		0.80 250.00/hr	200.00
9/12/2016	Review / term to reply elapsed 1/12/2016		0.30 250.00/hr	75.00
9/16/2016	Review, analyzed and lodged order for hearing to reply to Grovas motion.		0.10 125.00/hr	12.50
	Receiving email or memo from Mr. Sack, RE: Grovas and Room 29 expenses.		0.30 125.00/hr	37.50
	Legal Research of case law for reply motion to Grovas opposition to assumption of contract.		0.90 125.00/hr	112.50
9/19/2016	Drafted reply motion to Grovas' opposition to the assumption of Executory contract.		2.50 125.00/hr	312.50
	Continued to work on Reply Motion.		2.10 125.00/hr	262.50
	Email exchange with Mr. Sack, RE: Room 29 and room pool		0.40 125.00/hr	50.00
	Email exchange with Mrs. Zenaida Feliciano. RE: Room 29 - Grovas		0.40 125.00/hr	50.00
9/20/2016	Worked on draft of reply motion to Grovas' opposition. Argument lack of standby pursuant to Section 1109(b).		1.70 125.00/hr	212.50
	Final amendments to Reply motion to include Lcda. Fullana's comment and corrections.		0.50 125.00/hr	62.50
9/26/2016	Review and analyzed Omnibus motion filed by PRCI		0.80 125.00/hr	100.00
	SUBTOTAL:	[26.10	4,187.50]

125.00/hr

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Hrs/Rate Amount GENERAL MATTER/COMPILING INFORMATION 4/25/2016 Email: Requesting information as to Tax Return. 0.60 150.00 250.00/hr 5/24/2016 Meeting with Atty. Fullana to discuss status, pending matters 0.50 62.50 and course of action. 125.00/hr 5/25/2016 Meeting with Atty. Fullana to discuss strategy to address pool 0.60 75.00 issues of claim 10 and PREPA. 125.00/hr phone call with Mr. Sack, RE: PREPA and claim 10. 1.00 125.00 125.00/hr 6/14/2016 phone conference 0.30 75.00 250.00/hr phone conference 0.30 75.00 250.00/hr 6/16/2016 Meeting with Atty. Fullana to discuss issue with Room 10 1.00 125.00 executory contract 125.00/hr 6/17/2016 Receiving email from Mr. Sack Re: Room 29 executory contract 0.30 37.50 125.00/hr 6/20/2016 Analysis and review of contracts to be assumed 1.80 225.00 125.00/hr Phone call with Zenaida Feliciano Re: Room 29 contract and 0.60 75.00 Claim 10 125.00/hr 6/29/2016 phone call with Mrs. Lugo from easy check, RE: claim 8. 0.30 37.50 125.00/hr 8/16/2016 drafting and sending email or memo to Hiram Boscio, RE: 0.30 75.00 financial statement. 250.00/hr SUBTOTAL: 7.60 1,137.50] **GENERAL MATTERS DEBTOR OPERATIONS** 4/7/2016 Receiving email or memo from client. RE; invoice. 0.60 150.00 250.00/hr 4/28/2016 Email exchange with Carlos Aquino, RE: IVU filing and 0.80 200.00 payments. 250.00/hr 0.20 25.00 4/29/2016 Email from Mr. Sack, RE: AEE security deposit.

	Hrs/Rate	Amount
5/3/2016 phone call to CPA Rivera; RE: claims IVU and Tourism.	0.60 250.00/hr	150.00
5/11/2016 Receiving email or memo from Mr. Sack - Regarding new personal as to account payable.	0.60 250.00/hr	150.00
Email / RE: Mr. Sack regarding payment of AEE Bill.	0.60 250.00/hr	150.00
5/16/2016 Email exchange as to several issues -Bond from Tourism -IVU amounts -payment of fee, US Trustee.	0.80 250.00/hr	200.00
5/24/2016 Receipt, review and lodging of email from counsel for IRS / information phone conference Pedro Rivera.	0.60 250.00/hr	150.00
5/25/2016 Email from Mr. Sack; RE: letter	0.60 250.00/hr	150.00
Meeting with Atty. Bennazar y Atty. Fullana to discuss adversary to Mr. Bechara and Mr. Domenech.	1.30 125.00/hr	162.50
5/27/2016 Review documents required by the IRS/Planilla.	0.60 250.00/hr	150.00
6/1/2016 Receipt, review and lodging of Tourism; regarding filing with the Tourism Company	0.60 250.00/hr	150.00
6/2/2016 phone conference with Sack as to payment for AEE and fondo del seguro premium.	0.60 250.00/hr	150.00
6/14/2016 Review of information as to payments, email to Rivera	0.80 250.00/hr	200.00
phone conference with PJ Rivera, analysis of account and payments make phone conference Zenaida, RE: payment for April + May.	0.70 250.00/hr	175.00
6/16/2016 Conference claim of Grovas and T C Inmobiliaria	1.00 250.00/hr	250.00
Receipt, review and lodging of request certification from Registry of Property.	0.60 250.00/hr	150.00
Receipt, review and lodging of email request payments to AEE.	0.30 250.00/hr	75.00
6/17/2016 Analysis of court order re: assumption of contracts	0.20 125.00/hr	25.00

	Hrs/Rate	Amount
6/22/2016 Email to Lic Bennazar copy of title search.	0.30 250.00/hr	75.00
6/27/2016 email document/ memo received from client and reply to same. AEE and Domenech claims	1.00 250.00/hr	250.00
7/1/2016 email document/ memo received from Mrs. Lugo from easy check, RE: objection claim 8	0.40 250.00/hr	100.00
7/5/2016 email exchange RE: Room 29 contaminated pool.	0.60 250.00/hr	150.00
7/6/2016 Email from Lcdo. Carroll, return payment.	0.30 125.00/hr	37.50
7/11/2016 phone call to CPA Rivera.	0.60 250.00/hr	150.00
phone conference Sra. Santiago, RE: reconnection of services - email exchange with client copies of payments.	0.60 250.00/hr	150.00
Review and analyzed motion for audit filed by SIFC.	0.70 125.00/hr	87.50
Review and analyzed court order.	0.20 125.00/hr	25.00
7/15/2016 Receiving email or memo from Zenaida.	0.60 250.00/hr	150.00
Phone call with Zenaida Feliciano, RE: SIFC documents.	0.40 125.00/hr	50.00
7/18/2016 email document/ memo received from Mr. Sack, RE: utility services.	0.30 125.00/hr	37.50
7/19/2016 Amended motion to quash, RE: PRCI Intervention.	2.20 125.00/hr	275.00
7/20/2016 phone conference with Zenaida, RE: fondo del seguro del estado payment to US Trustee and AEE.	0.60 250.00/hr	150.00
phone conference with CPA Rivera information regarding manager reports and analysis.	0.60 250.00/hr	150.00
7/22/2016 Review and analyzed amended expert report sent by CPA Rivera.	1.20 125.00/hr	150.00
Review and analyzed court order and notices.	0.30 125.00/hr	37.50

		Hrs/Rate	Amount
7/28/2016 phone call with P.J. Rivera, RE: list of cas	ses and report.	0.40 125.00/hr	50.00
7/29/2016 phone conference with Zenaida, RE: poliz del estado.	za fondo del seguro	0.60 250.00/hr	150.00
8/1/2016 phone conference with Lic. Wally de la Roand registration, phone conference with Z		0.70 250.00/hr	175.00
Analysis of order for embargo in Adv. Aga	ainst T&C	0.30 125.00/hr	37.50
Receiving email from Mr. Sack. Re: forec	losure case in Aguada.	0.20 125.00/hr	25.00
8/2/2016 Receiving email or memo from Zenaida, Findel Seguro del Estado.	RE: information Fondo	0.60 250.00/hr	150.00
8/8/2016 Analysis of Motion filed by Grovas Rental		0.20 125.00/hr	25.00
8/9/2016 Phone call with IRS (Mrs. Natalie Pelaez)		0.40 125.00/hr	50.00
8/10/2016 Review with Lic. Capdevila, RE: IRS and	Tourism claims.	0.60 250.00/hr	150.00
8/11/2016 Email from Lcdo. Bennazar. Re: criminal	case against the HDP	0.60 125.00/hr	75.00
8/12/2016 Receipt, review and lodging of Registrar's	Certification property.	0.60 250.00/hr	150.00
8/15/2016 Receiving email from Mr. Sack. Re: Emba	argo in T&C adv.	0.40 125.00/hr	50.00
8/22/2016 Receipt, review and lodging of email, RE-	Payment of invoice.	0.30 250.00/hr	75.00
8/24/2016 phone call to Mr. Sack, non payment of ta	ixes post petition.	0.60 250.00/hr	150.00
8/25/2016 drafting and sending email or memo to M reports not paid - receipt reply.	r. Sack, RE: tax	0.60 250.00/hr	150.00
Receipt, review and lodging of post petition room tax.	on non payment of	0.60 250.00/hr	150.00
phone call with Mr. Fernandez from EDB, Hacienda.	RE: payment to	0.60 125.00/hr	75.00

	Hrs/Rate	Amount
8/25/2016 phone call with Mr. Freyre from EDB, RE: payment to Hacienda	0.40 125.00/hr	50.00
phone call to client Mr. Freyre form EDB, RE; payment to Hacienda	0.40 125.00/hr	50.00
8/26/2016 Receiving email or memo from Zenaida Feliciano, RE: managerial reports.	0.30 125.00/hr	37.50
9/1/2016 Review and analyzed court order, DKT's 19, 20 & 21	0.30 125.00/hr	37.50
9/2/2016 Receiving email or memo from Mr. Sack, RE; pool issue Room 10	0.30 125.00/hr	37.50
9/9/2016 Meeting with Atty. Fullana to discuss motion to dismiss of Domenech's claim in JRTC.	0.40 125.00/hr	50.00
9/16/2016 phone call with Mr. Sack, RE: motion filed by Tourism and Grove's Motion.	0.40 125.00/hr	50.00
phone call to AJB	0.60 250.00/hr	150.00
9/23/2016 Received email from debtor/RE: payment AEE.	0.60 250.00/hr	150.00
9/30/2016 phone call to Mr. Sack status of pending matters	0.60 250.00/hr	150.00
SUBTOTAL:	[35.60	7,287.50]
GENERAL MATTERS/FILING		
5/2/2016 Drafted and filed certificate of service for docket 160.	0.30 125.00/hr	37.50
5/16/2016 Filing of certificate of service.	0.10 125.00/hr	12.50
5/18/2016 Filing of certificate of service.	0.20 125.00/hr	25.00
Drafted certificate of service of objection to claim 17.	0.40 125.00/hr	50.00
Filing of objection to claim 17	0.20 125.00/hr	25.00
6/7/2016 Filed motion for entry of order.	0.10 125.00/hr	12.50

	Hrs/Rate	Amount
6/15/2016 Drafted motion for extension of time to file claims objection.	0.60 125.00/hr	75.00
Filing motion of extension of time.	0.10 125.00/hr	12.50
6/28/2016 Review and analyzed court order, RE: Extent ion of time.	0.20 125.00/hr	25.00
6/30/2016 Drafted motion for ext. of time.	0.30 125.00/hr	37.50
Filed motion for ext. of time.	0.10 125.00/hr	12.50
7/5/2016 Review and analyzed court order schedule due date.	0.10 125.00/hr	12.50
8/11/2016 Analysis of Court orders on Dkt 230 and 231	0.30 125.00/hr	37.50
8/15/2016 Analysis of court orders Dkt 235 and 236	0.30 125.00/hr	37.50
SUBTOTAL: [3.30	412.50]
LEGAL RESEARCH		
4/27/2016 Legal Research "Laches"	1.00 125.00/hr	125.00
4/28/2016 Legal Research, statute of limitation of debts held in trust.	1.60 125.00/hr	200.00
5/2/2016 Legal Research of IRS and Regulation as to responsibility to file a "planilla" when no tax liability arises on a certain period.	0.80 125.00/hr	100.00
5/9/2016 Legal Research of room tax cases in federal and state court.	2.30 125.00/hr	287.50
5/17/2016 Legal Research to Hacienda's interest regulation for assessment and collection of IVU.	2.00 125.00/hr	250.00
7/14/2016 Legal Research on judicial notice of Zika.	1.20 125.00/hr	150.00
7/15/2016 prepare for hearing for TRO, Researched cases and prepared oral arguments on judicial notice; case law on notification of injunction.	1.30 125.00/hr	162.50

		-	Hrs/Rate	Amount
8/30/2016	Legal Research of Property Registry records to check PRCI's claim		1.00 125.00/hr	125.00
8/31/2016	Review and analyzed property registry, folios on parcel with usufruct.		0.80 125.00/hr	100.00
9/1/2016	Legal Research of pending or supplemental jurisdiction in bankruptcy court; particular cases issue by Judge Lamoutte.		1.50 125.00/hr	187.50
9/2/2016	Legal Research of case law to support argument that the issue brought by PRCI's is non-core and lack of standing.		0.70 125.00/hr	87.50
9/16/2016	Legal Research of tolling of claims and case law quoted by Tourism in support of their claim.		0.70 125.00/hr	87.50
	SUBTOTAL:	[14.90	1,862.50]
	MONHTLY OPERATION REPORTS			
5/2/2016	Email to CPA Rivera, RE: report on IVU.		0.30 125.00/hr	37.50
5/27/2016	Receipt, review and lodging of MOR April.		0.60 250.00/hr	150.00
5/31/2016	Receipt, review and lodging of MOR April.		0.60 250.00/hr	150.00
8/15/2016	Receipt, review and lodging of MOR June email to accountant as to information		0.60 250.00/hr	150.00
8/25/2016	Drafting email to CPA Rivera, MOR July and analysis Domenech.		0.60 250.00/hr	150.00
9/23/2016	Receiving email or memo from CPA Rivera status of MOR.		0.60 250.00/hr	150.00
	SUBTOTAL:	[3.30	787.50]
	REVIEW POC/OBJECTIONS			
4/25/2016	Review objections to claim, filed by IRS.		0.60 250.00/hr	150.00
	Amended objection claim 8 filed by IRS.		2.70 125.00/hr	337.50
	Filing of objection to claim 8.		0.20 125.00/hr	25.00

	Hrs/Rate	Amount
4/26/2016 Prepared excel chart to break down Claim 16 items.	2.10 125.00/hr	262.50
Re-Filed objection to claim 8.	0.20 125.00/hr	25.00
Amended service language of objection to claim 8.	0.40 125.00/hr	50.00
Review and analyzed court order, RE: claim 8.	0.10 125.00/hr	12.50
4/27/2016 Amended objection to claim 16, filed by Hacienda.	1.90 125.00/hr	237.50
Telephone conference with Atty. Fullana, RE; discussion of change of legal strategy against Claim 16.	0.30 125.00/hr	37.50
4/28/2016 Amended objection to claim 16 of Hacienda.	2.10 125.00/hr	262.50
Email from Carlos Aquino, RE: IVU claim no. 17 and documents related to claim.	0.30 125.00/hr	37.50
4/29/2016 Worked on draft of objection to claim 17.	1.80 125.00/hr	225.00
5/2/2016 Amended objection to claim 16 as instructed by Atty. Fullana.	0.80 125.00/hr	100.00
Filing of objection to claim 16.	0.20 125.00/hr	25.00
Worked on draft of objection to claim 17.	1.80 125.00/hr	225.00
Email to client and Atty. Bennazar RE: Claim 16.	0.10 125.00/hr	12.50
Review of draft of objection to Hacienda claims.	0.80 250.00/hr	200.00
Discussion as to objection issues with the IVU claim.	0.80 250.00/hr	200.00
email document/ memo received from client, RE: AEE payments and Bond status.	0.60 250.00/hr	150.00
Email to CPA Rivera analysis of IVU payments.	0.60 250.00/hr	150.00

	Hrs/Rate	Amount
5/2/2016 Review final draft and objection to claim, Hacienda.	0.60 250.00/hr	150.00
5/12/2016 Worked on draft of objection to claim 4 of Tourism.	3.40 125.00/hr	425.00
Telephone conference with Atty. Fullana and CPA Rivera to discuss report made on claim 17 and U.S. T. objection to D. S.	1.00 125.00/hr	125.00
5/13/2016 Worked on objection to claim 4 filed by Tourism.	3.50 125.00/hr	437.50
5/16/2016 Worked on draft of objection to claim 17 filed by Hacienda for IVU.	3.30 125.00/hr	412.50
Drafted certificate for service of objection to claim 4.	0.40 125.00/hr	50.00
Filing of objections to claim 4.	0.20 125.00/hr	25.00
Worked on Draft of objection to claim 4.	3.30 125.00/hr	412.50
5/17/2016 Worked on draft of objection to claim 17	4.30 125.00/hr	537.50
5/18/2016 Worked on final drafts of objections to claim 17 to include Atty. Fullana's comments.	0.60 125.00/hr	75.00
5/24/2016 Email from IRS regarding objection and request for documents.	0.40 125.00/hr	50.00
phone call with Elizabeth Lugo from easy check./RE: objection claim 8.	0.70 125.00/hr	87.50
5/31/2016 Analysis of Answer to Objection to Claim 8	0.40 125.00/hr	50.00
drafting and sending email Aty. Carroll from IRS Re: objection claim 8	0.30 125.00/hr	37.50
Receiving email from Atty. Carroll from IRS. Re: Objection to Claim 8	0.20 125.00/hr	25.00
6/2/2016 Review and analyzed report made on claim 17.	0.90 125.00/hr	112.50
6/6/2016 Follow up - objection withholding taxes claim	0.60 250.00/hr	150.00

		Hrs/Rate	Amount
6/7/2016	Review and analyzed court order, RE; claim 16	0.30 125.00/hr	37.50
	Drafted motion to request entry of Order, Re: claim 16	0.60 125.00/hr	75.00
6/15/2016	Phone call with Mr. Sack Re; Claim 10 and executory contract of Room 29	0.40 125.00/hr	50.00
6/17/2016	Worked on draft of complaint for declaratory judgment	4.20 125.00/hr	525.00
	Phone call with Zenaida Feliciano re: Claim 10	0.50 125.00/hr	62.50
	Phone call with Mr. Sack re: Claim 10 and pool issue	0.50 125.00/hr	62.50
	Analysis of motion filed by Hacienda Re: Objection to Claim 17	0.30 125.00/hr	37.50
6/21/2016	Receiving email or memo from Zenaida Feliciano, RE: Claim 10 and Room 29	0.30 125.00/hr	37.50
6/30/2016	Receiving email or memo from Mrs. Elizabeth Lugo, RE: IRS claim.	0.40 125.00/hr	50.00
7/6/2016	Receiving email or memo from Mrs. Lugo, RE: IRS claim.	0.30 125.00/hr	37.50
7/7/2016	Amended complaint claim 10.	1.00 125.00/hr	125.00
	Receiving email or memo from Lcdo. Carroll RE; IRS claim	0.30 125.00/hr	37.50
7/19/2016	Drafted motion to inform status of objection and discovery with IRS.	0.60 125.00/hr	75.00
	Filing of motion to inform.	0.10 125.00/hr	12.50
7/20/2016	Review and analyzed response to objection filed by Hacienda.	0.60 125.00/hr	75.00
	Meeting with Atty. Fullana to discuss strategy for reply motion for Haciendas response.	0.50 125.00/hr	62.50
	Review status reply of Hacienda's reply to objection.	0.60 250.00/hr	150.00

Page

23

Page

0.40

125.00/hr

50.00

24

7/6/2016 Email CPA Rivera, RE: Tourism production of documents.

125.00/hr

Page

25

Claim 4

strategy for reply.

notifications from Tourism.

to Tourism's claim

claim 4.

125.00/hr

0.20

125.00/hr

1.10

125.00/hr

0.30

125.00/hr

1.00

250.00/hr

25.00

137.50

37.50

250.00

Page 26 Hrs/Rate Amount 8/4/2016 Receiving email from Mr. Sack Re: production of documents. 0.20 25.00 125.00/hr 8/8/2016 Receiving email from Mr. Sack. Re: Juan Bruno and Reports 0.30 37.50 125.00/hr 8/12/2016 Email from Lcda. Lopez. Re: Production of documents 0.40 50.00 125.00/hr 8/25/2016 Receipt, review and lodging of manager reports 2005 - 2013 0.80 200.00 250.00/hr Email to CPA Rivera: RE: Managerial Reports, Tourism claim 0.30 37.50 125.00/hr 8/26/2016 Review and analyzed Documents submitted by Juan Bruno on 1.80 225.00 Tourism and Hacienda. 125.00/hr 8/29/2016 Review and analyzed signed answers to interrogatories before 0.40 50.00 submitting them to Tourism. 125.00/hr Drafted letter to Tourism, RE: Rule 26(e) supplest 1.30 162.50 125.00/hr 9/1/2016 Email to Mr. Sack to request info on Marketing Fee and CPA 0.40 50.00 125.00/hr reports. Receiving email or memo from Mr. Sack, RE: marketing costs. 0.40 50.00 125.00/hr 9/2/2016 email document/ memo received from Mr. Sack, Re: marketing 0.60 75.00 expenses of Room 10. 125.00/hr 9/16/2016 Review, analyzed and lodged motion for hearing filed by 0.10 12.50 Tourism, Re: exhibits in Spanish. 125.00/hr Meeting with Lcda. Fullana to discuss Tourism's response and 1.00 125.00

Review and analyzed order setting due date for P.T report on

Drafted motion for leave to file, reply motion to DKT 253

Email exchange with Mrs. Feliciano, RE: postal address of

Receipt, review and lodging of discussion of reply to objection

		-	Hrs/Rate	Amount
9/19/2016	Meeting with Lcda. Fullana to discuss possible classification of Tourism as a recourse creditor.		0.40 125.00/hr	50.00
9/26/2016	Review and analyzed court order, DKT 262		0.20 125.00/hr	25.00
	SUBTOTAL:	[36.00	5,975.00]
	For professional services rendered		328.70	\$54,612.50
	Additional Charges:			
4/12/2016	Postage: Doc 152 - filed 04/12/16 amended notice certificate of	mai	ling.	8.50
	Doc 152 filed 4/12/16 - Amended notice and certificate of mailing	g.		1.90
4/13/2016	Notice del 28 de marzo - 2016, del CPA Pedro J. Rivera.			1.30
4/25/2016	Doc 153 filed 4/25/16 - Objection to claim 8 filed by IRS.			2.40
4/26/2016	Postage: Doc 153 filed 04/25/16 - objection to claim 8 - filed by	IRS		2.10
	Postage: Doc 157 filed 04/26/16 - objection to claim 8 filed by IR	RS.		2.50
	Order - Doc 156 filed 04/20/16			0.10
	Doc 157 filed 04/20/16 - Objection to claim 8 filed by IRS.			3.70
4/28/2016	Doc 158 filed 4/27/16 - Certificate of service.			0.40
	Email para confirmar reunion con AEE para el 10 de mayo.			0.20
5/2/2016	Postage:Doc 160 filed 05/02/2016 - Objection to claim 16 filed b Department of Treasury.	y th	e PR	4.20
	Email del 28 de abril de 2016 - AEE Bond			0.20
	Financial statement - April 30 de 2014			1.30
	Doc 160 filed 2/may/16 - Objection to claim 16 filed by the PR D Treasury.	ера	rtment of	5.50
5/6/2016	Mensajería: Entregar en AEE.			10.00
	Demanda de Tourism			1.30
5/9/2016	Tourism, contestacion a la Demanda			1.00
	Tourism - Escrito de HDP en cumplimiento de orden y oposicion embargo.	nas	olicitud de	0.30

		Amount
5/9/2016	Solicitud de reseñalamiento de conferencia sobre el estado de procedimientos	0.20
	AEE - agreement of indemnity - Universal Insurance	0.50
5/10/2016	Postage: Notice and certificate of mailing.	8.50
5/12/2016	Notice and certificate of mailing.	1.90
	Doc 163 filed 5/3/16 - United States Trustee's objection to debtor's disclosure statement.	0.60
5/16/2016	Postage: Objection Claim 4 Tourism.	7.85
	Objection Claim 4 - Tourism file copy and notices pursuant Rule 9014 (b)	14.00
5/18/2016	Postage: Objection claim 17, Hacienda.	1.40
	Objection claim 17 - Hacienda - File copy and notice pursuant to Rule 9014 (b)	2.50
5/31/2016	Doc 183 United States response to debtor's objection to claim.	0.30
6/2/2016	Postage:United States response to Debtor's objection to claim - Doc. 183 filed 5/31/2016 -	0.55
	United States response to debtors objection to claim - Doc 183 filed 5/31/2016.	0.90
6/6/2016	Motion to compel assumption or rejection of executory contract.	0.45
6/7/2016	Doc 187-188 filed 6/7/2016 - motion for entry of order granting objection to claim 6	0.45
6/9/2016	Doc 184 filed 6/2/2016 - motion for entry of order regarding contested matter with IRS	0.30
6/10/2016	Lista de cheques y facturas de AEE	3.15
6/16/2016	online request for certification from registry	15.00
	Doc 193 filed 6/15/16 - motion for extension of time	0.30
6/23/2016	Notice of electronic filing (Doc-200 y 201)	0.90
6/27/2016	Postage: Doc 202 - motion as to assumption of executory contract.	9.25
7/15/2016	Cost of parking	6.00
	Cost of parking	2.00
8/1/2016	Copias	212.00
	Doc 5 notice electronic filing.	0.40

	Amount
8/1/2016 Doc 16 filed 07/29/2016 - Report in compliance with order at docket no. 13	0.40
Doc 7 - filed 07/30/2016 - order and notice preliminary pretrial and scheduling conference.	0.80
Doc 216 filed 7/15/16 - limited objection to motion as to assumption of executory contracts	0.60
Doc 202 filed 6/27/16 - motion as to assumption of executory contracts.	1.40
Doc 217 filed 7/19/16 - motion of information status of contested matter between debtor and IRS.	0.40
Doc 218 filed 7/19/16 - motion to quash PRCI loans LLC's intervention for lack of standing.	1.60
Doc 214 filed 7/15/16 - motion to inform that no objection to debtors motion to assume certain executory contracts docket 202	0.40
Delivery Cost Certificate sobre en el correo	25.00
Postage: Doc 3 filed 7/22/16 urgent motion to request write to secure effectiveness of judgment.	1.45
Postage: Doc 6 filed 07/28/16 & 07/22/16 - summons complaint.	8.50
8/4/2016 Copias	0.60
8/10/2016 Postage: Sobre dirigido al Sr. Rabino Witz, fue devuelto por el correo.	2.10
Postage: Doc 202 filed 6/27/16 - Motion of executor contracts Doc 214 filed 7/15/16- motion to inform that no objection to Debtor's	0.77
8/23/2016 Postage: Sobre devuelto	0.55
8/27/2016	159.00
9/1/2016 Delivery Cost-Entregar Lcda. Giselle Lopez.	20.00
Copias	1.40
9/16/2016 costs interpreter o traductor; RE: Propiedad 3834-Rincon	325.00
9/28/2016 Postage:First set of interrogatories and notice of request of production of documents	1.25
9/30/2016 Scans	6.00

Case:15-03837-ESL11	Doc#:269-1 F	iled:10/21/16	Entered:10/21/16 10:43:11	Desc:	
Mr. Wilhelm Sack	Exhibit Inv	voice Page 30	O of 30	Page	30

		Amount
9/30/2016 Copies		163.60
SUBTOTAL:	[1,057.12]
Adversary matters, filing drafting		
7/7/2016 fees to be paid upon filing adversary proceeding Debtor v. Domenech		350.00
9/22/2016 fees to be paid upon filing adversary proceeding Debtor vs. Inmobiliaria T & C		350.00
SUBTOTAL:	[700.00]
Total costs		\$1,757.12
Total amount of this bill		556,369.62

I HEREBY CERTIFY THAT THE PRESENT INVOICE HAS NOT BEEN PAID. PLEASE INCLUDE INVOICE NUMBER. THANK YOU.

S/ Isabel M. Fullana